

ATTACHMENT B-2

(DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS FOR THE JURY)

1. Please name any high schools, colleges, technical schools, or graduate schools that you have attended and whether or not any degrees were obtained or received.
2. What was your major field of study?
3. Please tell us the names of any clubs, groups, or organizations that you belong to?
4. Have you ever been selected to serve on a jury? If so, were you the foreperson? Were you able to reach a verdict? Was there anything about that experience that would prevent you from being fair and impartial in this case?
5. Have you or any members of your family ever attended, or do you have any intention of going to law school?
6. Is there any juror who has had any legal training or any immediate family member who has had legal training?
7. Have you or any member of your family ever filed a lawsuit? If so, what was the nature of the suit? Who was sued and why? Were you satisfied with the result?
8. Have you or any member of your family ever been sued? If so, what was the nature of the suit? Were you satisfied with the result?

9. Has any juror, or any member of your family, or any close friend of yours, ever been a witness in a lawsuit? If yes, describe the lawsuit? Did the lawsuit involve an employment matter? Did the result of the lawsuit favor the employee or the employer? Do you believe the result of the lawsuit was fair? Why? Why not?
10. Has any juror ever read about or listened to news reports about the Fulton County Sheriff's Office?
11. Has any juror ever reviewed information on the Internet about the Fulton County Sheriff's Office?
12. Do you know any of the following individuals who may be called as witnesses by the Plaintiff or Defendants? (List each witness from Plaintiff's and Defendants' Witness Lists). If so, how do you know them?
13. As to any such witness would your knowledge of the witness in any way affect your ability to sit as a juror?
14. Have any of you ever read or heard anything, outside this court, about this case?
15. Is there anyone who believes that because Fulton County Sheriff Deputies are Defendants in this case that he or she cannot be fair or impartial and listen to all the evidence before making up his or her mind?

16. Does any here have any strong feelings about the Fulton County Sheriff's Office?
17. Have any of you ever had a job with any governmental agency, whether local, state or federal, including the military? If yes, state the governmental agency, the time of service, and in what capacity?
18. Have any of you, or any member of your family, or any close friend of yours ever sued or threatened to sue a governmental agency and/or governmental officer? If yes, please explain. Will this event prevent you from becoming a fair and impartial juror in this case?
19. Have any of you ever had good experiences with law enforcement?
20. Have any of you had good experiences with the Fulton County Sheriff's Office?
21. Do any of you think that being a law enforcement officer is a difficult job?
22. Is there anyone here who would not be able to find in favor of the Defendants if the Plaintiff fails to carry his burden of proof based on the evidence?
23. Will each of you be willing and able to treat the Plaintiff and the Defendants with equal fairness and justice? Will you be able to return a verdict based solely on the evidence, even if the verdict may mean that the Plaintiff will receive no money?

24. Have any of you, or any member of your family, or any close friend of your ever been arrested?
25. Have any of you, or any member of your family, or any close friend of your ever been charged with a crime?
26. Have any of you, or any member of your family, or any close friend of your ever been incarcerated?
27. Have any of you, or any member of your family, or any close friend of your ever been incarcerated in the Fulton County Jail?
28. Have any of you, or any member of your family, or any close friend of yours ever sued or thought about suing a sheriff's department? If yes, please explain.

Will this event prevent you from becoming a fair and impartial juror in this case?
29. Do any of you believe that you or any of your close friends or family has been the victim of deliberate indifference to safety by jailors? If yes, please explain.
30. Have any of you ever filed a complaint against a law enforcement agency or its officers?
31. Have any of you, or any member of your family, or any close friend of yours, ever worked in law enforcement?
32. How many of you think that law enforcement officers often unfairly target certain sectors of the population?

33. How many of you think that people sometimes file lawsuits that are frivolous?
34. How many of you think that just because someone files a lawsuit there must be some merit to it?
35. How many of you think that some people exaggerate when they do not get what they want in order to improve their chances of getting what they want?
36. How many of you think that just because someone files a lawsuit they should get some money?
37. Have any of you ever felt as if you were treated unfairly or victimized by a law enforcement officer?
38. How many of you know an individual who you believe have been treated unfairly or victimized by a law enforcement officer?
39. How many of you think that law enforcements officers often engage in misconduct?
40. How many of you think that law enforcement officers often abuse their authority?
41. Do any of you have any opinions or feelings about Fulton County, specifically, or about governmental entities in general that would affect your ability to be fair in a lawsuit alleging deliberate indifference to safety by Fulton County Sheriff Deputies?

42. The Plaintiff will present his witnesses first, and after the Plaintiff finishes, Fulton County will present its case. Can you wait until you have heard the entire case, from the Plaintiff and Fulton County, before you reach any decision on the issues so that you can be fair to both sides?